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June 6, 2006

Mr. Doyle Wilson
Remedial Project Manager
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

EPA Region 5 Records Ctr.



302551

RE: Groundwater Monitoring Work Plan Comments
Interstate Pollution Control/Roto-Rooter Superfund Site
Remedial Design/Remedial Action

Dear Mr. Wilson:

SECOR International Incorporated (SECOR) hereby submits our response to your comments on the Groundwater Monitoring Work Plan for the above-referenced project.

COMMENT 1. Pages 1-2 and 4-2 of this document and Section 2.4 of the Statement of Work (SOW) discuss the installation of 6 wells on site. Where will these wells be installed; what depth will they be; and what rationale was used to decide these details?

RESPONSE: The proposed well locations are shown on Figure 1.4, and include three upgradient and three downgradient wells, consistent with Section 2.4 of the SOW. The three upgradient wells will correspond with the approximate locations of former/abandoned monitoring wells MW-IPC2(S), MW-IPC4(S), and MW-IPC5(S). One of the three downgradient wells will correspond with the approximate location of former/abandoned monitoring well MW-IPC11(S). The remaining two new downgradient wells will be located along the southern property line of the site and provide roughly equidistant spacing of the three downgradient wells along that property line.

All of the wells, both upgradient and downgradient, will be screened at similar depths/elevations. In general, the wells will be screened near the top of the shallow saturated zone, but deep enough such that there is minimal likelihood of screen exposure during expected seasonal dry periods.

The rationale for locating the upgradient wells and one of the downgradient wells to correspond with former wells is that the historical data from the former/abandoned wells can then be reasonably compared to new data collected from the replacement wells, helping to fulfill the SOW requirements for monitoring the effectiveness of the engineered barrier in preventing surface water infiltration and providing data to assess the rate of monitored natural attenuation of contaminants in groundwater. The locations of the other two downgradient wells were selected to provide the highest probability of detecting off-site contaminant migration.

COMMENT 2. Page 1-2 mentions that 2 wells will be by the Rock River as stated in the SOW. What depth will these wells be and why.

RESPONSE: The two replacement "River Wells" will be installed to approximately the same depths as the former/abandoned "River Wells". As such, historical data from the old "River Wells" can be reasonably compared to new data collected from the replacement "River Wells". However, the shallow well will be installed at a slightly lower elevation (if necessary) to minimize the potential for screen exposure during seasonal dry periods.

COMMENT 3. Pages 1-2 and 6-1 mention the Five Year Review Reports. Per Section XII of the ROD, a summary report of groundwater monitoring data containing a statistical analysis of the data is to be provided to the Illinois EPA at least 90 days prior to each Five Year Review Report (which is prepared by the Illinois EPA). This schedule should be included in this Work Plan.

RESPONSE: The Work Plan will be revised accordingly to include the submittal to IEPA of the Five Year Summary Report containing the statistical analysis of groundwater monitoring data. The summary report will be submitted at least 90 days prior to each IEPA five year review, in accordance with Section XII of the ROD.

COMMENT 4. Pages 3-1 and 4-1 discuss plugging and sealing wells. Per Table 4 of the ROD, 35 IAC 811.316 is an ARAR for this task and should be included in this Work Plan.

RESPONSE: The Work Plan will be revised under "Monitoring Well Abandonment" to include 35 IAC 811.316 as an ARAR.

COMMENT 5. What is the schedule for providing the cost estimate, Quality Assurance Project Plan, Field Sampling Plan, and Health and Safety Plan?

RESPONSE: We anticipate that the cost estimate, QAPP, FSP, and HASP will be provided to the IEPA for review by the end of June 2006. Groundwater sampling and analysis will be performed for VOCs, in accordance with Section 2.4 of the SOW.

COMMENT 6. The rationale for establishing the COCs should be provided. The Risk Driving Chemicals of Potential Concern listed in Section V of the ROD need to be considered at a minimum. Also, the ultimate goal of groundwater monitoring needs to be discussed which is showing statistically significant decreases in on-site and down gradient concentrations of trichloroethene and 1,1,1-

trichloroethane in shallow groundwater (which cannot be attributed to upgradient sources).

RESPONSE: Proposed specific COCs and the rationale for their selection will be the basis of the Technical Memorandum, to be submitted within 45 days of completing the fourth consecutive quarterly monitoring event during the first year. In general, we expect that site-specific COC selection will be based on a statistical comparison between upgradient and downgradient constituent concentrations. Those constituents whose concentrations appear to be elevated in downgradient wells (above "background" concentrations) will be proposed as COCs.

Each of the Annual Reports (and the Five Year Review Reports submitted during years 5, 10, 15, etc.) will include a discussion regarding statistical changes in COC concentrations, including trichloroethene and 1,1,1-trichloroethane, not attributable to upgradient sources.

Groundwater sampling and analysis will be performed for VOCs, in accordance with Section 2.4 of the SOW.


COMMENT 7. Page 1-1 should include a statement that the FSP, QAPP, and HASP will be provided later.

RESPONSE: We will update page 1-1 to include a statement that the FSP, QAPP, and HASP will be provided at a later date.

Should you have any further questions, please do not hesitate to call.

Sincerely,

SECOR International Incorporated



Kenneth G. Smith, P.E.

Senior Civil Engineer

cc: Scott Moyer
Tom Lupo
Craig Simonsen
Michael Hirt